

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

24 MAG 4038

UNITED STATES OF AMERICA

v.

NOMMA ZARUBINA,
a/k/a “Alyssa,”

Defendant.

SEALED COMPLAINT

Violations of 18 U.S.C. § 1001

COUNTY OF OFFENSE:
NEW YORK

SOUTHERN DISTRICT OF NEW YORK, ss.:

PETER R. DUBROWSKI, being duly sworn, deposes and says that he is a Special Agent with the Federal Bureau of Investigation (“FBI”), and charges as follows:

COUNT ONE
(False Statements)

1. On or about April 20, 2021, in the Southern District of New York and elsewhere, NOMMA ZARUBINA, a/k/a “Alyssa,” the defendant, in a matter within the jurisdiction of the executive branch of the Government of the United States, knowingly and willfully made materially false, fictitious, and fraudulent statements and representations, to wit, during an interview with Special Agents from the FBI, ZARUBINA falsely stated that she had not been in contact with members of the Russian Government or Russian intelligence services, when, in truth and in fact, ZARUBINA had been in communication with an officer in the Federal Security Service of the Russian Federation (“FSB”), specifically an FSB officer based in Tomsk, Russia (“FSB Officer-1”), knew that FSB Officer-1 was an FSB officer, and that these communications included, among other things, FSB Officer-1 asking ZARUBINA to perform certain tasks in the United States on behalf of FSB Officer-1.

(Title 18, United States Code, Section 1001(a)(2).)

COUNT TWO
(False Statements)

2. On or about September 20, 2023, in the Southern District of New York and elsewhere, NOMMA ZARUBINA, a/k/a “Alyssa,” the defendant, in a matter within the jurisdiction of the executive branch of the Government of the United States, knowingly and willfully made materially false, fictitious, and fraudulent statements and representations, to wit, during interviews with Special Agents from the FBI, ZARUBINA falsely stated that she had only been interviewed once in Russia by an officer from the FSB about her time and activities in the United States, when, in truth and in fact, ZARUBINA had been in regular communication with FSB Officer-1 from at least in or around December 2020 through in or around 2022, and had agreed to help the FSB with particular tasks to perform in the United States on behalf of FSB

Officer-1.

(Title 18, United States Code, Section 1001(a)(2).)

The bases for my knowledge and for the foregoing charges are, in part, as follows:

3. I am a Special Agent with the FBI. I am currently assigned to the FBI's Counterintelligence Division, where I primarily investigate crimes related to Russia, including national-security related matters such as individuals acting as illegal agents of foreign governments in the United States and related conduct. I have been personally involved in the investigation of this matter, and I base this affidavit on that experience, my conversations with other law enforcement officials, and my examination of various reports and records. Because this affidavit is being submitted for the limited purpose of demonstrating probable cause, it does not include all the facts I have learned during this investigation. Where the contents of documents and the actions, statements, and conversations of others are reported herein, they are reported in substance and in part, except where otherwise indicated.

Overview

4. The FSB is Russia's principal security agency and is the successor agency to the Soviet Union's Committee for State Security, otherwise known as the KGB. The FSB is believed to engage in, among other things, intelligence gathering and other covert operations abroad, including in the United States. The FSB and particular FSB officers have been sanctioned in the United States by both the U.S. Department of the Treasury and U.S. Department of State. For example, on or about April 27, 2023, the Department of State designated the FSB pursuant to Executive Order 14078 for its involvement in the wrongful detention of at least one U.S. citizen abroad; in announcing the designation, the Secretary of State stated that the FSB has "repeatedly been involved in the arrest, investigation, and detention of U.S. nationals wrongfully detained in Russia." By way of further example, on or about June 23, 2023, the Department of the Treasury designated two FSB officers pursuant to Executive Order 14024 for their involvement in Russia's efforts to conduct global malign influence operations, including efforts to impact a local election in the United States. And on or about September 4, 2024, the Department of the Treasury's Office of Foreign Assets Control added 10 individuals and two entities to the Specially Designated Nationals and Blocked Persons List in response to Russia's malign influence efforts targeting the U.S. 2024 presidential election, including activities which were coordinated on behalf of the FSB.

5. NOMMA ZARUBINA, a/k/a "Alyssa," the defendant, is a Russian national living in the United States. While in the United States, ZARUBINA has, among other things, organized annual youth forums to promote Russian interests and influence in the United States and coordinated a meeting between Russian university students and then-Deputy Permanent Representative of the Russian Federation Mission to the United Nations ("Representative-1").

6. As set forth below, in or around December 2020, NOMMA ZARUBINA, a/k/a "Alyssa," the defendant, met with FSB Officer-1 in Russia and signed an agreement to help the FSB with "network marketing" in the United States. During this meeting, ZARUBINA was

assigned the codename “Alyssa” for use in internal FSB documents.¹ After that, ZARUBINA maintained regular contact with FSB Officer-1 until at least in or around 2022. For instance, ZARUBINA has been asked by FSB Officer-1 to, among other things, identify and develop potential contacts within the United States, including journalists and members of news outlets and think tanks. Consistent with those requests, ZARUBINA has attended seminars, forums, and conventions also attended by prominent members of academia, foreign policy, the U.S. government, and the media, with the goal of cultivating relationships in the United States and elsewhere.

7. During the course of this investigation, I and other FBI agents have conducted several voluntary interviews of NOMMA ZARUBINA, a/k/a “Alyssa,” the defendant, based in part on ZARUBINA’s close relationship and work with Elena Branson, who, as described further below, was charged by complaint in the Southern District of New York with, among other things, acting on behalf and at the direction and control of the Russian Government in the United States, in violation of the Foreign Agents Registration Act (“FARA”) and 18 U.S.C. § 951. The FBI first spoke with ZARUBINA in or around October 2020. During this initial meeting, in addition to stating that she had a close relationship with Branson, ZARUBINA told the FBI, among other things, that she had no relationship with Russian security or intelligence services outside of knowing some former classmates in those fields. In or around April 2021, the FBI met again with ZARUBINA. During that April 2021 meeting, which took place in New York, New York, ZARUBINA made knowingly false statements to the interviewing agents about her lack of connections to the FSB and her contacts with Russian intelligence services. Thereafter, the FBI continued to occasionally meet with ZARUBINA. It was not until in or around June 2024 that ZARUBINA admitted that she had previously lied to federal law enforcement officers about her association with the FSB, and specifically, FSB Officer-1, and admitted to the FBI certain aspects of her relationship with the FSB and taskings received from FSB Officer-1.

Investigation of Elena Branson and the RCNY

8. Based on my involvement in this investigation, including my conversations with other law enforcement officers, my review of reports and documents prepared and collected in connection with this and related investigations, my review of publicly available information, and my review of electronic communications obtained pursuant to judicially authorized search warrants and other process, I have learned the following, in substant and in part:

a. Elena Branson acted at the direction or control of the Russian Government to spread Russian influence in the United States, including through an organization incorporated by Branson in the United States named the Russian Center New York (“RCNY”).

b. On or about September 29, 2020, the FBI executed a judicially authorized search warrant on the RCNY office in Manhattan, which was also Branson’s residence. Approximately three weeks later, on or about October 20, 2020, Branson flew to Moscow, Russia, and has never returned. On March 8, 2022, Branson was charged by complaint in the Southern

¹ Based on my training and experience, I know that intelligence agencies like the FSB will often assign cover operatives code names for use in communications, and that an individual possessing such a code name is often an indicium of that individual’s standing within the organization.

District of New York with, among other things, acting on behalf and at the direction and control of the Russian government in the United States, in violation of FARA and 18 U.S.C. § 951, and conspiring with others to do the same. Branson remains at large.

c. NOMMA ZARUBINA, a/k/a “Alyssa,” the defendant, both worked for and shared a close personal relationship with Branson.² ZARUBINA was born in Tomsk, Russia in September 1990 and immigrated to the United States in approximately 2016 after receiving a graduate degree from the Russian Academy of National Economy and Public Administration (“RANEPA”). As reflected in one of ZARUBINA’s public social media profiles, ZARUBINA worked as a Political Affairs Officer for RCNY from approximately September 2016 to approximately February 2022. During her initial voluntary interview with the FBI in October 2020, discussed further below, ZARUBINA confirmed that she managed the RCNY’s public-facing website.

FBI Interviews of ZARUBINA

9. Based on my participation in this investigation, including my communications with other law enforcement officers, my review of law enforcement reports and publicly available records, and my involvement in certain interviews of NOMMA ZARUBINA, a/k/a “Alyssa,” the defendant, I have learned, among other things, the following:

a. As described above, ZARUBINA was identified by the FBI as an individual potentially involved in the activities of Branson and others, based in part on her close relationship with Branson and work with RCNY. *See supra* ¶ 8(c). The FBI first approached ZARUBINA in or around October 2020 in connection with the investigation into Branson. As set forth below, during multiple subsequent meetings with the FBI, ZARUBINA confirmed, among other things, her close relationship with Branson and her work for the RCNY. Moreover, as also described further below, during those meetings, ZARUBINA initially denied having any involvement or contact with the FSB, when in fact, and as she would later admit, ZARUBINA had communicated with FSB Officer-1 on numerous occasions, including with respect to requests made of ZARUBINA by FSB Officer-1.

b. On or about October 5, 2020, FBI agents conducted their first voluntary interview of ZARUBINA at a restaurant in Brooklyn, New York.³ During that interview, ZARUBINA stated that she had known Branson for several years, had a close relationship with Branson’s daughter, and worked with Branson in maintaining the RCNY website, including by posting articles and links, some of which ZARUBINA wrote herself. ZARUBINA also discussed the RCNY’s cultural events and acknowledged that certain events that Branson led had been

² In addition to working together, Branson is also the godmother of ZARUBINA’s daughter.

³ Unless otherwise noted, all the other interviews described herein took place in New York, New York. At no point during those interviews was ZARUBINA under arrest or told that her presence was mandatory. Indeed, on numerous occasions, ZARUBINA has initiated contact with the FBI and requested to continue meeting with the FBI to provide information.

directly supported by the Moscow City Government and acknowledged speaking at one such event in the United States led by Branson.

c. During this initial interview, FBI agents asked ZARUBINA whether she had ever had any contact with members of the Russian security or intelligence services. ZARUBINA responded, in substance and in part, that some of her classmates from RANEPA worked for Russian security or intelligence services, but that she had no relationship with those individuals outside of their prior studies. Toward the end of the interview, ZARUBINA asked the agents what type of charges the FBI was considering as to Branson and what capabilities the FBI had to monitor cellular phones.

d. On or about April 20, 2021, after the FBI's broader investigation into Branson and others had gone overt through witness interviews around the country, and after Branson fled the United States for Russia, FBI agents again met with ZARUBINA. During this meeting, ZARUBINA stated that she had recently traveled to Russia between November 2020 and January 2021 and met with Branson. ZARUBINA inquired as to the status of the investigation into Branson and mentioned that ZARUBINA had recently received a notification that a subpoena had been served on ZARUBINA's social media and communications accounts that bore the same case number reflected on the search warrant that authorized the search of Branson's residence described above. *See supra* ¶ 9(b).

e. During that same interview, ZARUBINA was also asked whether she had any contact with Russian intelligence services during her recent trip to Russia. Similar to her earlier response, ZARUBINA stated that she attended college in Russia with classmates who went to work for Russian intelligence services, but that she did not know them well and was not in contact with them. When asked again whether she had any contact with Russian intelligence services during her recent trip to Russia, ZARUBINA stated that her only contact with the Russian government on that trip was a contact with the Russian health department in connection with COVID-19 travel procedures in place at the time.

f. On or about August 15, 2022, FBI agents met again with ZARUBINA. During the interview, ZARUBINA stated that she had worked with two Russia-affiliated non-governmental organizations ("NGOs") and that her "function" within these NGOs was to "make contacts" and "build connections with important people." ZARUBINA also stated that she had again recently traveled to Russia, where she again met with Branson, who asked ZARUBINA whether ZARUBINA had any additional information on the status of Branson's case and if ZARUBINA knew whether Branson could travel.⁴ ZARUBINA also told the agents that she did not speak with Branson regularly and that, on her recent trips to Russia, she did not have any interactions with Russian authorities or government officials.

g. During that same interview, ZARUBINA also stated that she had a close personal relationship with Representative-1 and that she had been in regular contact with Russia-

⁴ ZARUBINA's travel records reflect that she traveled on multiple occasions to Russia, the United Arab Emirates, and Turkey, between May 2021 and August 2022. Several photographs from ZARUBINA's publicly available social media profile also reflect that she was in Russia at various times between May 2021 and August 2022.

based representatives of Rossotrudnichestvo.⁵ In addition, ZARUBINA stated that she continued to attend foreign policy events in the United States to build her network of contacts.

h. On or about January 3, 2023, FBI agents met again with ZARUBINA. During the interview, ZARUBINA stated that she had previously participated in a master's degree program in Russia focused on national security and that most of her classmates went on to work for the Russian military or security services, but that she had no interest in working for the Russian Government and instead wanted to work internationally. ZARUBINA also stated that she had recently attended networking events in the United States, where she tried to make as many contacts as possible, including a retired U.S. military general.

i. Approximately one month later, on or about February 2, 2023, FBI agents met again with ZARUBINA. During the interview, ZARUBINA stated that she had not spoken to Representative-1 since early January 2023 and that Representative-1 was the only diplomat at the Russian Mission with whom she communicated. ZARUBINA also stated that she had recently read the "Branson document" (*i.e.*, the criminal complaint filed against Branson, which was publicly filed on or about March 8, 2022) and asked how it was possible to know what behavior was not allowed, particularly regarding Russian culture.

j. On or about September 20, 2023, I and other FBI agents met again with ZARUBINA. During that interview, ZARUBINA stated that she had been in contact with a particular lieutenant colonel in the FSB ("FSB Officer-2"), with whom ZARUBINA had previously attended university and developed a personal relationship. ZARUBINA further detailed that ZARUBINA and FSB Officer-2 use a particular encrypted messaging application to communicate with each other. FSB Officer-2 told ZARUBINA that his job within the FSB involves questioning Russian nationals who live and work in the United States upon their return to Russia. FSB Officer-2 also described ZARUBINA's official FSB profile to her, which FSB Officer-2 told ZARUBINA bears a notation that she is a good communicator and has strong interpersonal skills and that these skills are rare for people who work with the FSB.⁶

k. During that same interview, ZARUBINA told the agents that she had only been questioned once before by the FSB on a trip back to Russia from the United States, sometime

⁵ Based on my involvement in this investigation, I know that the Federal Agency for the Commonwealth of Independent States Affairs, Compatriots Living Abroad, and International Humanitarian Cooperation, or "Rossotrudnichestvo," is an autonomous Russian federal government agency under the jurisdiction of the Russian Ministry of Foreign Affairs whose primary responsibility is administering civilian foreign aid and cultural exchange. Open-source reporting reflects that Rossotrudnichestvo is the "main state agency projecting the Kremlin's soft power and hybrid influence" and "[f]or many years it has been acting as an umbrella organization for a network of Russian compatriots and agents of influence[.]" See <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=OJ:L:2022:193:FULL&from=EN>, at 187.

⁶ Based on my involvement in this investigation, I have learned that the FSB, like many intelligence agencies, maintains "profiles" of individuals who, among other things, work for the FSB or for whom the FSB has previously interviewed or may seek to recruit.

prior to Russia's February 2022 invasion of Ukraine. ZARUBINA stated that, upon arriving in her hometown of Tomsk, Russia, she was asked to participate in an interview with an FSB officer, who asked ZARUBINA about her time and activities in the United States. ZARUBINA then told the agents that she had not been interviewed by the FSB or Russian security services on any other occasions. ZARUBINA further told the agents that she is no longer in contact with Branson, but that she had met with Branson in 2022 shortly before Russia invaded Ukraine, at which meeting Branson asked ZARUBINA whether ZARUBINA could ask the FBI whether it was safe for Branson to return to the United States.

l. On or about June 27, 2024, I and other FBI agents met again with ZARUBINA.⁷ During that interview, ZARUBINA provided additional details about her relationship with Branson, including how Branson mentored ZARUBINA in the United States and connected her to people that Branson thought were important. ZARUBINA then went on to describe her personal relationship with FSB Officer-2 in Moscow.

m. During that same interview, ZARUBINA stated that the FSB officer whom she previously said had interviewed her on a return trip from the United States, *see supra* ¶ 9(k), was in fact FSB Officer-1 and that she had previously withheld FSB Officer-1's name from the FBI. ZARUBINA stated that, when she first met with FSB Officer-1 in or around December 2020 in Tomsk, Russia, FSB Officer-1 wanted to "map out" ZARUBINA's network in the United States and find ways to take advantage of ZARUBINA's useful contacts.⁸ ZARUBINA agreed to work with FSB Officer-1, signed an agreement to help the FSB with "network marketing," and was assigned the codename "Alyssa" for use in internal FSB documents. Thereafter, from in or about December 2020 to in or about June 2022, FSB Officer-1 and ZARUBINA met several times in person and communicated frequently via encrypted messaging applications. During these meetings and in other communications, FSB Officer-1 spoke with ZARUBINA about how she could cultivate contacts in local American news outlets, and instructed ZARUBINA to share journalists' contact information with FSB Officer-1.⁹

n. FSB Officer-1 further instructed ZARUBINA to attend the 2021 St. Petersburg International Economic Forum ("SPIEF") and asked her to find journalists who would be willing to publish positive stories about the event and Russia. In addition, FSB Officer-

⁷ In addition to the interviews described herein, between approximately April 2024 and May 2024, ZARUBINA participated in two additional voluntary interviews with the FBI and prosecutors from the U.S. Attorney's Office for the Southern District of New York. ZARUBINA was represented by counsel during those interviews. No information from those counseled interviews is contained in this Complaint. In addition, prior to commencing the June 27, 2024 interview described herein, ZARUBINA confirmed that she was no longer represented by counsel and that she wanted to speak with the FBI, and ZARUBINA's former counsel confirmed that he no longer represented ZARUBINA.

⁸ Based on my review of publicly available information, I know that FSB Officer-1 is based in Tomsk, Russia, consistent with ZARUBINA's statements to the FBI about where FSB Officer-1 worked and where ZARUBINA met with FSB Officer-1 in or around December 2020.

⁹ ZARUBINA told the FBI that she never provided FSB Officer-1 with media contacts.

1 provided ZARUBINA with the names of individuals at U.S.-based think tanks and other organizations, and instructed ZARUBINA to obtain information about those individuals and/or to reach out to them. Based on my review of photographs posted on ZARUBINA's public social media profile, I know that ZARUBINA took several photographs in or around June 2021 of herself and others at the SPIEF. Those included photographs of ZARUBINA with prominent business leaders, including the founder of Canada Eurasia Russia Business Association, and the Deputy Chief Executive of the Tatarsan Investment Development Agency, a special executive body of the government of the Republic of Tatarsan that is responsible for all international investment and business projects in the Republic of Tatarsan. Some of those photographs are depicted below:

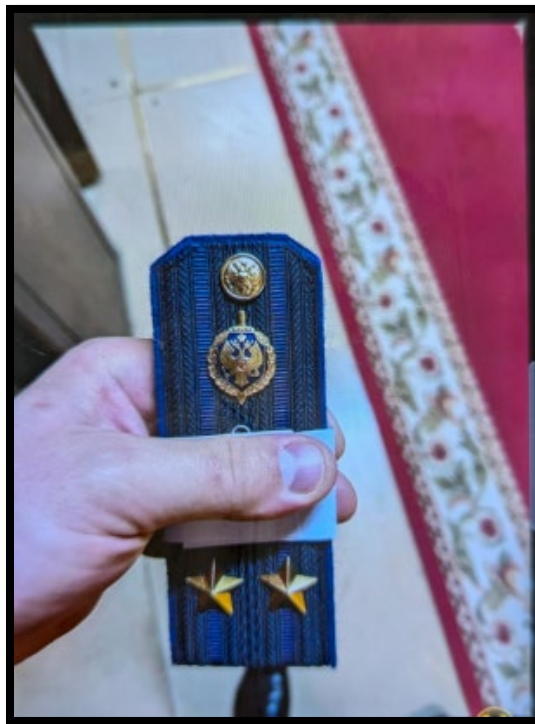


o. Moreover, based on my review of the contents of ZARUBINA's cellphone pursuant to a judicially authorized search warrant, I know that on or about June 3, 2021, and consistent with FSB Officer-1's directive to make contact with journalists, ZARUBINA took a photograph of the contact information of a producer at a German public, state-owned international media company.

p. On or about July 24, 2024, I and other FBI agents met again with ZARUBINA. During that interview, ZARUBINA stated that FSB Officer-1 had previously asked ZARUBINA to identify potentially helpful contacts in the United States, including American journalists and military personnel, and provide contact information for those individuals to FSB Officer-1 so that FSB Officer-1 could come up with reasons to invite those people to Russia to "convert" these contacts to the "Russian way of thinking." On another occasion, in or around May 2021, FSB Officer-1 asked ZARUBINA to look into a particular individual in the United States ("Individual-1") of interest to FSB Officer-1, which ZARUBINA agreed to do. ZARUBINA then provided Individual-1's social media profile, along with information that FSB Officer-1 requested about Individual-1's mother, to FSB Officer-1 via a telephone call. ZARUBINA also stated that all her electronic communications with FSB Officer-1 had occurred over a particular encrypted

messaging application (“Encrypted Application-1”) and all of those communications disappeared after being transmitted. ZARUBINA also showed the FBI agents a contact card on her cellphone for an individual she identified as FSB Officer-1. The contact card, which was the only contact that ZARUBINA had on Encrypted Application-1, bore FSB Officer-1’s last name and a Russian telephone number. ZARUBINA stated that she was no longer in contact with FSB Officer-1 and that her relationship with FSB Officer-1 had been complicated both personally and professionally, which led ZARUBINA to feel manipulated by FSB Officer-1 and ultimately led to a fracture in their relationship.

q. During this interview, ZARUBINA also showed FBI agents a photograph that FSB Officer-2 had previously sent to ZARUBINA of FSB Officer-2’s FSB epaulet, which, based on my review of publicly available information, I know to be consistent with a Russian epaulet given to a lieutenant colonel, which is the rank that ZARUBINA previously described as being FSB Officer-2’s rank. *See supra* ¶ 9(j). A photograph of FSB Officer-2’s epaulet is depicted below:



q. Finally, during this same interview, ZARUBINA admitted that she had previously falsely denied contact with the FSB because she was afraid of admitting her relationship with the FSB to the FBI. ZARUBINA further stated that she had not known the FBI agents long enough to be entirely truthful during those earlier interviews.

10. Based on my participation in this investigation, including my conversations with law enforcement agents involved in the investigation that resulted in the charges contained in the Branson Complaint, which, as described above, were brought in the Southern District of New York, I have learned, in substance and in part, that the false statements made by NOMMA ZARUBINA, a/k/a “Alyssa,” the defendant, including during the April 20, 2021 and September

20, 2023 interviews described above regarding her lack of contact with Russian security or intelligence services, were conveyed to federal investigators, including the undersigned.

WHEREFORE, I respectfully request that a warrant be issued for the arrest of NOMMA ZARUBINA, a/k/a "Alyssa," the defendant, and that she be arrested, and imprisoned or bailed, as the case may be.

/s/ Peter R. Dubrowski, by SDA with permission

PETER R. DUBROWSKI
Special Agent
FBI

Sworn to me through the transmission of
this Complaint by reliable electronic
means (telephone), this 19th day of November, 2024.



THE HONORABLE STEWART D. AARON
United States Magistrate Judge
Southern District of New York